

**From:** [Vergeront, Julie](#)  
**To:** [Aselda.Thompson@shell.com](mailto:Aselda.Thompson@shell.com)  
**Subject:** RE: Shell Puget Sound Refinery  
**Date:** Monday, December 21, 2020 10:54:00 AM

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Thanks, Aselda.

The first change is fine. For the second, we need to look back in our files to see where the vapor cloud description came from before making a decision.

I'm in the office all day today, out Tuesday and back in Wednesday. We are closed on Thursday and Friday.

Regards,

**Julie A. Vergeront**

Assistant Regional Counsel  
EPA Region 10  
1200 Sixth Avenue, Suite 155, M/S 11-C07  
Seattle, WA 98101  
206-553-1497  
[vergeront.julie@epa.gov](mailto:vergeront.julie@epa.gov)

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**From:** [Aselda.Thompson@shell.com](mailto:Aselda.Thompson@shell.com) <[Aselda.Thompson@shell.com](mailto:Aselda.Thompson@shell.com)>  
**Sent:** Monday, December 21, 2020 9:21 AM  
**To:** Vergeront, Julie <[Vergeront.Julie@epa.gov](mailto:Vergeront.Julie@epa.gov)>  
**Subject:** RE: Shell Puget Sound Refinery

Many thanks Julie – we are taking a look and will get back to you ASAP. A couple of initial notes that I thought I would go ahead and send to you (I'll send requested edits in a draft once we've had a chance to fully review):

Our investigation noted that there was primarily one step that was misunderstood or not completed, so would request the language below:

3.53 On February 20, 2015, operators at the Facility **did not properly complete** ~~skipped~~ **several one or more** steps in an operating procedure when shutting down the East Flare during a partial shutdown/turnaround operation at the Facility.

Regarding the use of the term “vapor cloud” – we have never seen the issue described as a vapor cloud, but instead it was perceptible odors. Vapor cloud to us connotes a visible cloud.

3.55 As a result of these failures, un-combusted vapors containing hydrogen sulfide, dimethyl sulfide, mercaptans, pyrophoric iron, benzene, and other hazardous substances were

released from the East Flare, resulting in a vapor cloud reached perceptible odors reaching the Swinomish Reservation, the City of La Conner, and surrounding areas.

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**From:** Vergeront, Julie <[Vergeront.Julie@epa.gov](mailto:Vergeront.Julie@epa.gov)>  
**Sent:** Friday, December 18, 2020 6:13 PM  
**To:** Thompson, Aselda J SHLOIL-LSPT/EE <[Aselda.Thompson@shell.com](mailto:Aselda.Thompson@shell.com)>  
**Subject:** RE: Shell Puget Sound Refinery

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Here is a draft Consent Agreement and Final Order with Region 10's standard terms. Note that it is still undergoing review by Region 10 management and I am sending it to you subject to their review.

Please let me know if you have any comments or questions.

We'll do our best to get it entered by the end of the year, but it will be close.

If we do get it signed before year end, we'll plan on doing the press release during the first couple of weeks in January. I will give you a heads up about when that will be and also will give you a copy of the press release a few hours before we release it to our press contacts.

I am in the office Monday and Wednesday of next week.

Regards,

**Julie A. Vergeront**

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**From:** [Aselda.Thompson@shell.com](mailto:Aselda.Thompson@shell.com) <[Aselda.Thompson@shell.com](mailto:Aselda.Thompson@shell.com)>  
**Sent:** Friday, December 18, 2020 6:41 AM  
**To:** Vergeront, Julie <[Vergeront.Julie@epa.gov](mailto:Vergeront.Julie@epa.gov)>

**Subject:** RE: Shell Puget Sound Refinery

Thanks Julie – the client is very motivated to take care of this in 2020 if at all possible, so please let me know if there is anything I can do to expedite! Do you have a draft CAFO?

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**From:** Vergeront, Julie <[Vergeront.Julie@epa.gov](mailto:Vergeront.Julie@epa.gov)>

**Sent:** Thursday, December 17, 2020 8:28 PM

**To:** Thompson, Aselda J SHLOIL-LSPT/EE <[Aselda.Thompson@shell.com](mailto:Aselda.Thompson@shell.com)>

**Subject:** Shell Puget Sound Refinery

**Think Secure. This email is from an external source.**

I was out of the office today and just received your voice mail message.

That is very good news! There is no public comment period on administrative settlements under the Clean Air Act.

It will be tight to get this settlement finalized before the year end but I will do my best. I am around most of the time.

I am in the office all day tomorrow (or I should say, working all day tomorrow!). I am free from 7:30 to 10 and after 11:30 PST.

Regards,

**Julie A. Vergeront**

Assistant Regional Counsel

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